

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**CRIMINAL NO. 15-721 (FAB)**

**[1] JOSE REYES-VALDIVIA,  
[2] WILFREDO EL LIS BOLIVAR,  
[3] JEFFRI DAVILA-REYES,  
Defendants.**

**UNITED STATES OF AMERICA’S DESIGNATION OF EVIDENCE  
UNDER RULE 12 (b)(4)**

COMES NOW the United States of America, by and through the undersigned attorneys, and states that pursuant to Rule 12(b)(4)(A) of the Federal Rules of Criminal Procedure, it is providing notice that it intends to use in its case-in chief the following evidence against all defendants whether original or copies:

1. Videos of vessel interdiction taken from law enforcement aircraft
2. Photographs of vessel interdiction
3. Photographs of vessel boarding
4. Diagram of vessel
5. IONSCAN 400B Calibration and Test Logs
6. CBP Aircraft log of October 29, 2015
7. Statements by Defendants made during the Coast Guard boarding
8. Statements made by the Defendants subsequent to their arrest

The United States respectfully reserves its right to amend the preceding list for purposes consistent with the Federal Rules of Evidence and to supplement the same, as it deems necessary, with timely notice to the Honorable Court and the defendants.

WHEREFORE, the United States of America respectfully requests that this Honorable Court take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of March 2016.

Rosa Emilia Rodríguez-Vélez  
United States Attorney

//s//Glenn H. Goetchius

Glenn H. Goetchius,  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to defense counsel.

In San Juan, Puerto Rico, this 25th day of March 2016.

//s//Glenn H. Goetchius

Glenn H. Goetchius,  
Special Assistant U.S. Attorney